REMARKS

Claims 1-33 remain pending in this application. Each of the pending claims is believed to define an invention that is novel and unobvious over the cited references. Favorable reconsideration of this case is respectfully requested.

Claims 1, 27, 29 and 30 have been rejected under 35 U.S.C. 112, second paragraph as being indefinite. In particular, the Examiner questions how the modification of the camera motion layer takes place without editing any frame of the original video sequence. Because they are different things, editing the camera motion layer is not the same thing as editing any frame of the original video sequence. A camera motion layer is not a frame.

The rejected claims, for example claim 1, recites that the camera motion layer is " a layer comprised of a composite representation of background data from a plurality of frames in the original video sequence" Other claims recite that the camera motion layer contains "at least one substantially non-stationary component". For example, the specification states that "camera motion layers are layers that appear to move with the camera as they camera moves". The camera motion layers can be considered to be in the background of a frame and "generally correspond to the background of a video frame". Please see, for example, paragraph 36 of the specification. The specification also provides examples of camera motion layers, for example, background composites and the "sprite" in MPEG-4 video encoding. Please see the present specification, for example, paragraph 36.

Additionally, the process of editing the camera motion layer is described in more detail in paragraph 45 which states:

> " By editing a single camera-motion layer, the entire video sequence relying on
> the camera-motion layer is modified. With the invention, by only editing a single
> camera-motion layer, the corresponding sequence of frames in the composite
> video sequence is affected. Compared to the conventional techniques, the
> technique of the invention does not require every frame of the video sequence to
> be edited to effect a change in the resulting composite video sequence".

Thus, the specification describes how a camera motion layer is derived from multiple frames in an input video sequence and is fundamentally different from any one of the multiple frames in that sequence. Consequently, it is respectfully submitted that one of ordinary skill in the art when reading the claims and specification is able to comprehend the claimed invention. Thus, it is respectfully submitted that all pending claims are in all aspects in compliance with 35 U.S.C. 112. Therefore, the withdrawal of this rejection is respectfully requested.

Claims 1-2, 22, 25-27 and 29 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Maeda in view of Burt et al. and further in view of U.S. Patent Number 5,708,845 to Wistendahl et al.

The claims are amended to add additional details regarding the camera-motion layer and the fixed frame layer.

As detailed in the response filed on March 29, 2007, which is incorporated herein, neither Maeda, Burt or their combination teach or suggest editing the original camera motion layer without editing frames of the original sequence as is recited in the rejected claims. Wistendahl is now cited as teaching this feature.

In particular, column 4, lines 60-67 and column 5, lines 64-67 of Wistendahl are cited. These portions of Wistendahl describe how a media stream might contain certain objects and a separate stream "image mapping data" might contain display location coordinates of those objects so that the objects can be tracked. These portions of Wistendahl do not relate to the claimed language at issue.

As an initial matter, it is unclear what is meant by the statement in the Office Action that in Wistendahl "the frame only contains the location coordinates of the object". Please see page 4 of the Office Action. It is clear from Wistendahl that the frame contains all image contains, while the image mapping data contains the location coordinates for the objects in the frame so the objects may be tracked. For example, Figure 2, as described in column 5, lines 46-67 of Wistendahl, illustrates

14

an individual frame. The individual frame includes an image of an object A and an object B. Thus, it is clear that the frame contains the images. "The display location coordinates of the define pixels and the frame addresses of the frames in which the areas appears are stored separately as object mapping data", column 5, lines 64-67.

Additionally, simply storing the location of objects in the frames does not allow for editing of the objects in the frame as the location is stored separately form the objects. For example, assume a video sequence contains an object, for example a car. For each frame the location, contour, or bounding box of that car is stored. This may result in an original media stream and a secondary stream of image mapping data containing the object coordinates. Editing the object coordinates does not edit the input video sequence. Furthermore, it is not clear how the input video sequence could be edited in the system of Wistendahl since Wistendahl in fact never mention anything at all regarding video editing.

In view of the above, it is clear that Wistendahl does not supplemental Maeda and Burt to teach or suggest modifying the original fixed frame layers by editing the original camera motion layer, without editing any frames of the original video sequence in the claimed combination. Therefore, the withdrawal of this rejection is respectfully requested.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

While Applicants do not necessarily concur with the Office Action's characterizations of the claims and/or the references with regard to other claimed features, Applicants choose not to discuss each such feature. Consequently, the lack of explicit discussion is not to be understood as indicating tacit agreement with such characterizations.

If the Examiner is of the opinion that the prosecution of this application would be advanced by a personal interview, the Examiner is invited to telephone undersigned counsel to arrange for such an interview.

15

The Commissioner is authorized to charge any fee necessitated by this Amendment to our Deposit Account No. 22-0261.

Dated: 7/17/07

Respectfully submitted,

By _____
Jeffrey A. Kaminski
   Registration No.: 42,709
VENABLE LLP
P.O. Box 34385
Washington, DC 20043-9998
(202) 344-4000
(202) 344-8300 (Fax)
Attorney/Agent For Applicant